

jackson|lewis.

Jackson Lewis P.C.
666 Third Avenue
New York, New York 10017
Tel 212 545-4000
Fax 212 972-3213
www.jacksonlewis.com

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DIRECT DIAL: (212) 545-4021
EMAIL ADDRESS: JASON.ZOLDESSY@JACKSONLEWIS.COM

U.S. DISTRICT COURT
DOCUMENT
ELECTRONICALLY FILED

VIA ECF

DOC #: _____
DATE FILED: 1/31/2020

Honorable Colleen McMahon, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

January 29, 2020

*OK - He motion for
has been denied - go lost
conference rescheduled
for 2/28 @ 10:00 AM*

Re: **Jones v. Association for Rehabilitative
Case Management
Case No. 1:19-cv-10114 (CM)**

Dear Chief Judge McMahon:

We are counsel for Defendant Association for Rehabilitative Case Management and Supported Housing Program, Inc. in connection with the above-referenced case. I write to request a brief adjournment of the Initial Pretrial Conference with the Court currently scheduled for February 21, 2020 at 9:45 a.m., as I will be out of the country that day on a trip that was scheduled last year. As there is a pending motion that has been fully briefed, we understand from Your Honor's Individual Practices and Procedures that even if the parties are able to stipulate to a conforming proposed case management plan (which the parties have conferred on but to date are yet to reach agreement on) the conference will not be cancelled.

I sought consent for this request from Plaintiff's counsel, but counsel has advised that they are unwilling to consent to the request because they have not received similar courtesies in the Housing Court cases that the parties are litigating. We note that Jackson Lewis is not representing any party in the Housing Court cases and I have no familiarity with the specific circumstances of any adjournment request(s) by counsel in the Housing Court case(s).

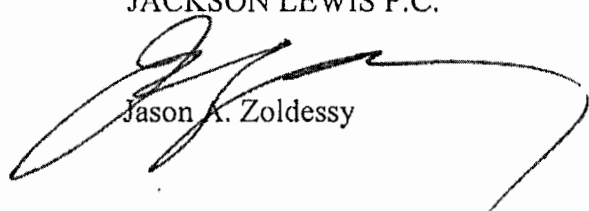
If the request is granted, the undersigned is available for the conference any day the week of February 24-28 (except for the morning of Tuesday February 25). I am also available the prior week on Tuesday February 11th. This is the first request for an adjournment of the Initial Pretrial Conference and, if granted, it will not affect any other scheduled dates.

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We thank the Court for its consideration in this regard.

Respectfully submitted,

JACKSON LEWIS P.C.


Jason A. Zoldessy

cc: All Counsel (Via ECF)